

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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AVALON HOLDINGS CORP.,

Plaintiff,

– against –

GUY GENTILE, et al.,

Defendants.
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Case No. 18-cv-7291 (DLC) (RWL)

NEW CONCEPT ENERGY, INC.,

Plaintiff,

– against –

GUY GENTILE, et al.,

Defendants.
-----X

Case No. 18-cv-8896 (DLC) (RWL)

**NON-PARTY SUBPOENA RECIPIENT FORD O'BRIEN LANDY LLP'S
NOTICE OF MOTION TO IMPOSE SANCTIONS**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the declaration of Adam C. Ford, the exhibits attached thereto, and oral argument on a date and at a time to be set by the Court, non-party subpoena recipient Ford O'Brien Landy LLP moves this court to impose sanctions on Plaintiff Avalon Holdings Corp. and its attorney David Lopez.

Respectfully submitted,

FORD O'BRIEN LANDY LLP

/s/ Adam C. Ford

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